

Deficiency Status Report 4

Status Report Submitted: September 20, 2007

CUPA Name: Los Angeles City Fire Department

Evaluation Date: April 12 and 13, 2006

Next Status Report Due: September 21, 2007

State Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor

OES Evaluator: Fred Mehr

SWRCB Evaluator: Marci Christofferson

Based on the CUPA's corrective action responses, the following deficiencies are considered corrected and no further updates are required: 1, 2, 3, 5

Deficiencies and Corrective Actions

4. **Deficiency:** The UST operating permit does not contain the monitoring options used for the tank and piping systems or have a statement that the monitoring, response, and plot plans are to be maintained on site with the permit.

Preliminary Corrective Actions: Include how the tank and piping systems are monitored on the operating permit, and verbiage that states that the approved monitoring, response, and plot plans are to be maintained on site with the permit.

CUPA's 3rd Status Update: This has been done. Refer to information on submitted status report #3.

Cal/EPA's 3rd Response: The information submitted with the 3rd status report was not adequate to correct this deficiency. Please refer to the attachment for water board's comments. Please submit an updated UST operating permit to Cal/EPA by August 16, 2007.

CUPA's 4th Status Update: Deficiencies 1, 2, 3, 5, and part of 4 have been corrected. The Los Angeles City Fire Department is currently in correspondence with Mr. Kareem Taylor (CalEPA/ Unified Program) to rectify deficiency #4. As discussed on September 12, 2007 during our teleconference with Mr. Taylor, Los Angeles City Fire Department will continue to work towards the resolution of this deficiency. The following

procedures will be used as a roadmap to develop a form in Envision to fulfill the State Water Resource Control Board (SWRCB) requirement.

1. Meet with our Management Information systems (MIS) to discuss the development of a form in Envision that will fulfill the SWRCB required information.
 - a. *On September 18, 2007, the Los Angeles Fire Department met with MIS to discuss the development of the form with the required UST and piping monitoring information. MIS was informed that this table would be a third page to the existing operating permit. MIS indicated that during the next two weeks they would be checking to see if the required fields exist in Envision and looking into how long it will take to generate such a form.*
 2. Once the form has been generated it will be provided to Mr. Taylor and the SWRCB for comments and recommendations.
 3. Then, a blank approved form will then be provided to the UST tank operators to be filled and submitted with their UST monitoring reports. If resources are available the existing UST monitoring reports will be used to populate the forms.
 4. The final step will be to include the form with the UST and piping monitoring information as an attachment to the operating permit.
5. **Deficiency:** The CUPA does not approve and/or review monitoring, response and plot plans for accuracy and/or applicability. When the application for the UST permit is submitted, data entry is performed and the forms filed. The UST inspector prints out a summary of information prior to the UST program inspection, but it does not include the specific tank or piping information, monitoring information, financial responsibility information, etc. The information located at the facility is not compared to what has been submitted.

Preliminary Corrective Actions: Provide a procedure to ensure that all of the permitting information has been submitted, reviewed for completeness and approved. Verify that it is accurate for the facility. During an inspection compare what is submitted to the information located at the facility.

CUPA's 3rd Status Update: The inspectors will review the permitting information for completeness, and will verify that it is accurate for the facility. During the inspection the inspector will compare what is submitted to the information located at the facility.

Cal/EPA's 3rd Response: Cal/EPA considers this deficiency corrected.